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*Attorneys for Defendant Crystal Ewing*

**UNITED STATES DISTRICT COURT**

## FOR THE DISTRICT OF NEVADA

United States,

Case No.: 2:19-CR-00170-APG-CWH

110

Plaintiff,

Crystal Ewing,

## **Unopposed Motion to Terminate Pre-Trial Supervision**

Defendant.

Defendant Crystal Ewing (the “defendant” or “Ms. Ewing”), by and through undersigned counsel, moves this Court, pursuant to 18 U.S.C. §§ 3142(c)(3) and 3145(a)(2), for an Order terminating Pre-Trial Supervision as a condition of her release on a personal recognizance bond. This motion is supported by Ms. Ewing’s Pre-Trial Services Officer Jessie Moorehead and is unopposed by the United States.

## Points and Authorities

Ms. Ewing made her Initial Appearance before the Court on July 31, 2019, pursuant to a Superseding Information and Plea Agreement. ECF No. 9. She was released on a personal recognizance bond; one of the conditions of her release was Pre-Trial Services supervision. Ms. Ewing has been successfully supervised by Mr. Moorehead since that time. She has been totally

1 compliant since her release and, given her age, the crime to which she pled, and her personal  
2 characteristics, she has been deemed by Pre-Trial Supervision to be a low-risk supervisee.<sup>1</sup>

3 On May 18, 2021, undersigned counsel received an electronic mail message (“email”) from  
4 Mr. Moorehead recommending that Ms. Ewing be removed from supervision. As Mr. Moorehead  
5 noted:

6 I just don’t think she is benefiting from supervision and Pretrial Services could  
7 focus our supervision on other defendants with risk. I wouldn’t expect any issues  
8 with Ms. Ewing if the court removed her Pretrial supervision.

9 Email dated May 18, 2021 from Jessie Moorehead to Crane Pomerantz.

10 Thereafter, by email dated May 25, 2021, government counsel indicated that they do not object to  
11 removing Ms. Ewing from supervision. Ms. Ewing understands that, if this motion is granted, all  
12 other conditions of release will remain in place.

13

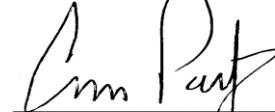
### 14 Conclusion

15 For all of the foregoing reasons, Ms. Ewing respectfully requests that the Court issue an  
16 Order modifying her conditions of release to terminate Pre-Trial Services Supervision.

17 DATED this 3<sup>rd</sup> day of June, 2021.

18

19 SKLAR WILLIAMS PLLC

20 

21 Crane M. Pomerantz, Esq.  
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24 IT IS SO ORDERED:

25 Dated: June 3, 2021   
26

27 ANDREW P. GORDON  
28 UNITED STATES DISTRICT JUDGE

<sup>1</sup> At Mr. Moorehead’s direction, Ms. Ewing does not physically report to the Pre-Trial Services Office, due to her poor health.